Message

From: Khan, Faruque [Khan.Faruque@epa.gov]
Sent: 3/28/2022 7:16:04 PM
To: Sankula, Sujatha [Sankula.Sujatha@epa.gov]; Orrick, Greg [Orrick.Greg@epa.gov]; Farruggia, Frank [Farruggia.Frank@epa.gov]
Subject: RE: broflan and PFAS

Will do

From: Sankula, Sujatha <Sankula.Sujatha@epa.gov>
Sent: Monday, March 28, 2022 3:15 PM
To: Orrick, Greg <Orrick.Greg@epa.gov>; Farruggia, Frank <Farruggia.Frank@epa.gov>; Khan, Faruque <Khan.Faruque@epa.gov>
Subject: RE: broflan and PFAS

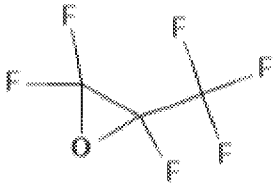
Faruque

Did we reach out to Kerr Leifer (RD) on the classification of Broflanilide as PFAS. I brought this up in my General now and was suggested to reach out to him on this. Please send an email to him. Thank you.

From: Orrick, Greg <Orrick.Greg@epa.gov>
Sent: Monday, March 28, 2022 11:59 AM
To: Farruggia, Frank <Farruggia.Frank@epa.gov>; Khan, Faruque <Khan.Faruque@epa.gov>; Sankula, Sujatha <Sankula.Sujatha@epa.gov>
Subject: RE: broflan and PFAS

The definition of PFAS has evolved over the years. It used to refer to long-chain fluorinated organic molecules, like PFOA and PFOS. Now, PFAS includes short-chain alternatives to PFOA and PFOS, like GenX (HFPO), although I'm not seeing a clear definition anywhere: (https://www.niehs.nih.gov/health/materials/perfluoroalkyl_and_polyfluoroalkyl_substances_508.pdf, https://www.epa.gov/chemical-research/human-health-toxicity-assessments-genx-chemicals).

Broflanilide has there trifluoromethyl groups. But it's unclear to me whether its most heavily fluorinated side chain would be considered a short-chain PFAS (*i.e.*, perfluorinated carbon chain that could behave as a PFAS). It is structurally similar to HFPO, which may be as toxic or more toxic than PFOA:



HFPO (GenX)

OPP doesn't have the expertise to evaluate potential pesticide PFAS issues without collaboration with OPPT. I hope we plan to collaborate.

From: Farruggia, Frank <Farruggia.Frank@epa.gov>
Sent: Monday, March 28, 2022 10:39 AM
To: Khan, Faruque <Khan.Faruque@epa.gov>; Sankula, Sujatha <Sankula.Sujatha@epa.gov>

Cc: Orrick, Greg <Orrick.Greg@epa.gov>
Subject: RE: broflan and PFAS

I agree with you Faruque, the structure doesn't fit the definition of a PFAS as written but we know that effectively it is acting in a similar way. So, the question is, should it be treated in the same way as a PFAS if not lumped into that group of chemicals?

We did have discussions about this during the review.

Frank

From: Khan, Faruque <Khan.Faruque@epa.gov>
Sent: Monday, March 28, 2022 10:35 AM
To: Sankula, Sujatha <Sankula.Sujatha@epa.gov>
Cc: Orrick, Greg <Orrick.Greg@epa.gov>; Farruggia, Frank <Farruggia.Frank@epa.gov>
Subject: RE: broflan and PFAS

Hi Sujatha,
Initially, we were contemplating broflanilide could be a PFAS compound but after examining the structure of the compound we collectively decided against PFAS designation. PFAS compounds are usually aliphatic long chain fluorinated compounds.
Greg and Frank: Do you have any additional info on PFAS compounds?
Thanks
daruque

From: Sankula, Sujatha <Sankula.Sujatha@epa.gov>
Sent: Monday, March 28, 2022 9:44 AM
To: Khan, Faruque <Khan.Faruque@epa.gov>
Subject: broflan and PFAS

Faruque

I saw RD scheduling a meeting soon on broflan to discuss PFAS concerns. Can you let me know how it applies to this chemical. I don't recall us talking about it before. Please let me know. Thank you.

Sujatha

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